

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JAMES CONTANT, <i>et al.</i> ,	:
	:
<i>Plaintiffs,</i>	:
	:
v.	:
	:
BANK OF AMERICA	:
CORPORATION, <i>et al.</i> ,	:
	:
<i>Defendants.</i>	:
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Case No. 17 Civ. 3139 (LGS)
[related to Case No. 13 Civ. 7789 (LGS)]
ORAL ARGUMENT REQUESTED

**NOTICE OF FOREIGN DEFENDANTS' MOTION
TO DISMISS THE COMPLAINT
FOR LACK OF PERSONAL JURISDICTION**

PLEASE TAKE NOTICE that, upon the accompanying papers described herein, and upon all prior pleadings and papers filed herein, that:

Defendants The Bank of Tokyo-Mitsubishi UFJ, Ltd., Barclays Bank PLC, HSBC Holdings plc and HSBC Bank plc, The Royal Bank of Scotland Group plc, Société Générale, Standard Chartered Bank, and UBS AG (collectively, the "Foreign Defendants") hereby move this Court, before the Honorable Lorna G. Schofield, United States District Judge for the Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007 (the "Court"), on a date and time to be determined by the Court, for an order pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, dismissing all claims against them in the Consolidated Class Action Complaint filed June 30, 2017 (ECF 84), for lack of personal jurisdiction, and for such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that the accompanying papers, filed in support of this Rule 12(b)(2) motion to dismiss, consist of:

(a) Foreign Defendants' Memorandum of Law in support of Motion to Dismiss for Lack of Personal Jurisdiction; and

(b) the Declaration of Eric J. Stock in support of Foreign Defendants' Motion to Dismiss for Lack of Personal Jurisdiction, dated August 11, 2017, to which the following declarations are attached:

(1) Declaration of Elizabeth Hyon, dated August 10, 2017, on behalf of Barclays Bank PLC;

(2) Declaration of Nicola S. Black, dated June 8, 2017, on behalf of HSBC Holdings plc and HSBC Bank plc;

(3) Declaration of Mark Chambers, dated June 8, 2017, on behalf of HSBC Holdings plc and HSBC Bank plc;

(4) Declaration of Gavin A. Francis, dated June 13, 2017, on behalf of HSBC Holdings plc and HSBC Bank plc;

(5) Declaration of William Gougherty, dated August 4, 2017, on behalf of The Royal Bank of Scotland Group plc;

(6) Declaration of John Connors, dated June 15, 2017, on behalf of UBS AG;

(7) Declaration of Dominick R. Sabella, dated November 20, 2015, on behalf of The Bank of Tokyo-Mitsubishi UFJ, Ltd.;

(8) Declaration of Dominique Bourrinet, dated July 17, 2017, on behalf of Société Générale; and

(9) Declaration of Barbara McAll, dated January 20, 2017, on behalf of Standard Chartered Bank.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Order, filed August 4, 2017 (ECF 95), Plaintiffs shall file any response to this Rule 12(b)(2) motion to dismiss no later than September 27, 2017, and the Foreign Defendants shall file any reply in support of this motion no later than October 24, 2017.

PLEASE TAKE FURTHER NOTICE that the Foreign Defendants request oral argument in connection with this Rule 12(b)(2) motion to dismiss.

Dated: New York, New York
August 11, 2017

Respectfully submitted,

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